

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ALABAMA  
SOUTHERN DIVISION**

**IN RE: BLUE CROSS BLUE SHIELD )  
ANTITRUST LITIGATION (MDL No. )  
2406), )**

**Plaintiff,**

**) CIVIL ACTION NUMBER:  
) Master File No. 2:13-CV-20000-  
) RDP  
)  
)**

**SELF-FUNDED SUBCLASS OBJECTORS’  
MOTION TO SUBMIT DOCUMENTS FOR *IN CAMERA* REVIEW**

The Self-Funded Subclass Objectors ServisFirst Bancshares, Inc., Employee Services, Inc., and Topographic, Inc. move the Court to permit them to file certain documents for review *in camera*.

1. Counsel for the Self-Funded Subclass Objectors have certain letter agreements authorizing their engagement as counsel for the Self-Funded Objectors. It is unclear to counsel for the Objectors whether the Long Form Notice approved by the Court requires that documents merely reflecting the terms of their engagement as counsel for Objectors must be submitted in support of the objection. *See* Long-Form Notice at Question #14 (“Any agreements that relate to the objection or the process of objecting between you, your counsel, and/or any other person or entity.”). To the extent engagement-related documents are required, Counsel for the Self-Funded Subclass hereby seek permission to file them for *in camera review* only and

will then seek similar disclosure of all other engagement letters and fee agreements between the parties to the proposed class settlement and their counsel. The exhibits referenced by this paragraph are referred to as Exhibits 08A–E in support of Objector’s objection.

2. No party will be prejudiced by this motion.

3. These documents represent communications between counsel and their clients regarding counsel’s engagement by their clients. The only possible relevance these documents could possess is to establish the ***absence*** of terms in the agreements reflecting some improper purpose related to the Objection. The Court can satisfy itself of the absolute absence of any such concern without the need to disclose these documents to any party.

For these reasons, the Self-Funded Subclass Objectors and their counsel ask the Court to either confirm that their engagement of counsel documentation need not be submitted, or in the alternative to grant this motion to file counsel engagement documents for *in camera review* only.

Respectfully submitted,

/s/J. Thomas Richie

One of the Attorneys for the Self-Funded  
Subclass Objectors

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## CERTIFICATE OF SERVICE

I hereby certify that on July 28, 2021, the foregoing was electronically filed with the Clerk of Court using the CM/ECF system which will send notification of such filing to all counsel of record.

I further certify that on July 28, 2021, the foregoing was mailed to the following recipients by United States Mail, First-Class Postage Prepaid:

Blue Cross Blue Shield Settlement  
c/o JND Legal Administration  
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*s/J. Thomas Richie*

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One of the Attorneys for Objectors